

**IN THE DISTRICT COURT FOR THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

**MOTION FOR ADMISSION OF DARRELL S. CAFASSO *PRO HAC VICE***

Dudley, Topper and Feuerzeig, LLP, by Chad C. Messier, respectfully moves this Court, pursuant to LRCi 83.1(b)(2) and (c), to admit Darrell S. Cafasso *pro hac vice* in the captioned proceeding.

In support of this motion, the following is respectfully represented:

1. Attorney Cafasso is a member in good standing of the New York and New Jersey Bars. *See* Pro Hac Vice Application attached as **Exhibit 1** at § B(2); Certificate of Good Standing, attached as **Exhibit 2**.

2. Attorney Cafasso is not under suspension or disbarment by any court. *See Exhibit 1* at § A(2); Declaration of Darrell S. Cafasso at ¶ 4, attached as **Exhibit 3**.

3. The undersigned, a member in good standing of the bar of this Court, has entered an appearance on behalf of defendant William C. Erbey and all notices, orders and pleadings may be served on the undersigned.

4. On information and belief, the undersigned certifies, pursuant to LRCi 83.1(b)(2), that Attorney Cafasso has only been admitted *pro hac vice* before this Court one time during the twelve (12) months immediately preceding the filing of this motion. The other matter in which Attorney Cafasso has been admitted *pro hac vice* is *City of Cambridge Ret. Sys. V. Altisource Asset Mgmt. Corp. et al.*, District Court of the Virgin Islands, Divisions of St. Croix, Case No. 1:15-cv-0004 (WAL)(GWC). *See* Exhibit 1 at § B(6).

5. On information and belief, Attorney Cafasso is fully qualified to appear *pro hac vice* before this Court.

6. The \$250.00 fee for Attorney Cafasso's *pro hac vice* admission will be paid to the Clerk of this Court contemporaneously with the filing of this motion.

Accordingly, it is respectfully requested that this Court admit Attorney Cafasso *pro hac vice* in the captioned proceeding. A proposed order is attached.

Respectfully submitted,

DUDLEY, TOPPER AND FEUERZEIG, LLP

/s/ Chad C. Messier

Dated: December 15, 2015

By:

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Chad C. Messier (VI Bar No. 497)  
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Attorneys for Defendant,  
William C. Erbey

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of December, 2015, I electronically filed the foregoing **MOTION FOR ADMISSION OF DARRELL S. CAFASSO** with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Kevin A Rames, Esq.  
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And a copy will be served by placing same in the U.S. Mail, postage prepaid, addressed to the following non-filing users:

Laurence M. Rosen, Esq.  
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/s/ Chad C. Messier

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Chad C. Messier, Esq.